

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, *et al.*,

Defendant-Intervenors,

and

STATE OF NEW JERSEY

Defendant-Intervenor.

Case No. 1:18-CV-68

**DEFENDANT-INTERVENORS' AMENDED MOTION**  
**TO EXCEED PAGE LIMITS**

Defendant-Intervenors Karla Perez, et al. (“Defendant-Intervenors”) respectfully amend their Unopposed Motion to Exceed page Limits (*see* ECF No. 166) to request the same 36 page extension requested by Plaintiffs (*see* ECF No. 185). As Plaintiffs’ Motion indicates, this action raises complex issues in a case of national importance, and equity requires affording the parties equal opportunity to present these issues to the Court. All parties had agreed not to oppose motions to extend the length of their respective filings by 29 pages, to a total of 49 pages (the same as Plaintiffs’ initial memorandum in support of their Motion for a Preliminary Injunction). Plaintiffs, however, filed a request to exceed the 20-page limit by 36 pages in their post-discovery brief in support of their Motion for a Preliminary Injunction (*see* ECF No. 185), rather

than by the agreed-upon 29 pages. Plaintiffs represented that the motion for an additional 36 pages was unopposed. Defendant-Intervenors do not oppose the request for 36 pages, but Defendant-Intervenors do request that they receive the same length for their brief as Plaintiffs do, as a matter of equity (and especially in light of the fact that Plaintiffs have already filed a 49-page memorandum in support of their motion).

Defendant-Intervenors' initial Motion was unopposed, and we follow Plaintiffs in assuming that the parties' initial agreement to a 29-page extension also extends to seeking a 36-page extension. Defendant-Intervenors amended Motion is for good cause and in the interest of justice, not for delay, and no party will be prejudiced if the extension is granted.

### **CONCLUSION**

For the foregoing reasons, Defendant-Intervenors respectfully request that the Court grant Defendant-Intervenors' Amended Motion to Exceed Page Limits.

Dated: July 21, 2018 Respectfully Submitted,

### **MEXICAN AMERICAN LEGAL DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046);

(SD of Tex. Bar No. 21127)

Attorney-in-Charge

Celina Moreno (Tex. Bar No. 24074754)

(SD of Tex. Bar No. 2867694)

Jack Salmon (Tex. Bar No. 24068914)

(SD of Texas Bar No. 1130532)

Alejandra Ávila (Tex. Bar No. 24089252)

(SD of Tex. Bar No. 2677912)

Ernest I. Herrera (Tex. Bar No. 24094718);

(SD of Tex. Bar No. 2462211)

110 Broadway, Suite 300

San Antonio, Texas 78205

Phone: (210) 224-5476

Facsimile: (210) 224-5382  
Email: [nperales@maldef.org](mailto:nperales@maldef.org)

Denise Hulett  
Mexican American Legal Defense and  
Educational Fund  
1512 14<sup>th</sup> Street  
Sacramento, CA 95814  
Phone: (916) 444-3031  
Email: [dhulett@maldef.org](mailto:dhulett@maldef.org)  
(Admitted pro hac vice)

Priscilla Orta  
Mexican American Legal Defense and  
Educational Fund  
11 East Adams, Suite 700  
Chicago, IL 60603  
Tel: (312) 427-0701  
Email: [porta@maldef.org](mailto:porta@maldef.org)  
(Admitted pro hac vice)

**ROPES & GRAY LLP**

Douglas H. Hallward-Driemeier  
(admitted pro hac vice)  
2099 Pennsylvania Ave NW  
Washington, DC 20006-6807  
Phone: (202) 508-4600  
Facsimile: (201) 508-4650  
Email: [Douglas.Hallward-Driemeier@ropesgray.com](mailto:Douglas.Hallward-Driemeier@ropesgray.com)  
(Admitted pro hac vice)

**GARCÍA & GARCÍA,  
ATTORNEYS AT LAW P.L.L.C.**

Carlos Moctezuma García  
(Tex. Bar No. 24065265)  
(SD of Tex. Bar No. 1081768)  
P.O. Box 4545  
McAllen, TX 78502  
Phone: (956) 630-3889  
Facsimile: (956) 630-3899  
Email: [cgarcia@garciagarcialaw.com](mailto:cgarcia@garciagarcialaw.com)

*Attorneys for Defendant-Intervenors Karla Perez et al.*

**CERTIFICATE OF CONFERENCE**

I certify that on July 12 and 13, 2018, counsel for the parties conferred regarding the relief requested in Defendant-Intervenors' initial motion and counsel for Plaintiffs, Defendants, and the State of New Jersey as Defendant-Intervenor each indicated that they did not oppose that motion.

/s/ Nina Perales

Nina Perales

Attorney for Defendant-Intervenors

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on July 21, 2018, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales

Nina Perales

Attorney for Defendant-Intervenors